



REAL WORLD TESTING PLAN TEMPLATE

Perk Medical Systems LLC (PCB Apps LLC)

GENERAL INFORMATION

Plan Report ID Number: [For ONC-Authorized Certification Body use only]

Developer Name: Perk Medical Systems LLC (PCB Apps LLC)

Product Name(s): ezPractice

Version Number(s): V15.1

Certified Health IT Product List (CHPL) Product Number(s): 15.07.04.2154.Ezpr.15.01.1.230208

Developer Real World Testing Plan Page URL: <https://penn-clinical.com/real-world-testing-plan>

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

Provide an explanation for the overall approach to Real World Testing, including an outline of the approach and how data will be used to demonstrate successful Real World Testing.ⁱ

All measures should reasonably align with the elements within a Real World Testing plan, the scope of the certification, the types of settings in which the certified health IT is marketed, and other factors relevant to the implementation of the certified Health IT Module(s). The justification should reflect how each element within the plan is relevant to the developer's overall strategy for meeting the Real World Testing Condition and Maintenance of Certification requirements.

Note: A single Real World Testing plan may address multiple products and certification criteria for multiple care settings.

ezPractice is an open source electronic health records and medical practice management software package that is used in the ambulatory primary/specialty care and behavioral health care settings.

ezPractice will utilize Real World Testing to demonstrate interoperability and functionality in real world settings and scenarios. Perk Medical Systems LLC will develop a reporting algorithm that will calculate Real World Testing metrics from real world data by analyzing the activity logs. This reporting algorithm will calculate the Real World Testing metrics for the pertinent 2015 Cures Edition criteria that are required for ezPractice's Real World Testing. These metric results will then determine and ensure successful Real World Testing while also providing insights that can be used to improve compliance and improve ezPractice. The ezPractice users will run this report algorithm and submit the results to the Perk Medical Systems LLC.

STANDARDS UPDATES (INCLUDING STANDARDS VERSION ADVANCEMENT PROCESS (SVAP) AND UNITED STATES CORE DATA FOR INTEROPERABILITY (USCDI))

Both required and voluntary standards updates must be addressed in the Real World Testing plan. Real World Testing plans must include all certified health IT updated to newer versions of standards prior to August 31 of the year in which the updates were made.

Describe approach(es) for demonstrating conformance to all certification requirements using each standard to which the health IT is certified. List each version of a given standard separately. For each version of a standard submit the following:

- ✓ Identify standard versions
- ✓ Indicate what certification criteria in which product(s) has been updated
- ✓ If reporting for multiple products, identify the certification criteria that were affected by the update for each of the associated products
- ✓ CHPL Product Number for each Health IT Module
- ✓ Method used for standard update (e.g., SVAP)
- ✓ Date notification sent to ONC-ACB
- ✓ If SVAP, date notification sent to customers
- ✓ Measure used to demonstrate conformance with updated standard(s)
- ✓ Which certification criteria were updated to USCDI and/or to which version of USCDI was the certification criteria updated?

| | |
|---|----------------|
| Standard (and version) | Not Applicable |
| Updated certification criteria and associated product | Not Applicable |
| CHPL Product Number | Not Applicable |
| Method used for standard update | Not Applicable |
| Date of ONC ACB notification | Not Applicable |
| Date of customer notification (SVAP only) | Not Applicable |
| Conformance measure | Not Applicable |
| USCDI updated certification criteria (and USCDI version) | Not Applicable |

MEASURES USED IN OVERALL APPROACH

Each plan must include at least one measurement/metric that addresses each applicable certification criterion in the Health IT Module’s scope of certification. Describe the method for measuring how the approach(es) chosen meet the intent and purpose of Real World Testing.

For each measurement/metric, describe the elements below:

- ✓ Description of the measurement/metric
- ✓ Associated certification criteria
- ✓ Justification for selected measurement/metric
- ✓ Care setting(s) that is addressed
- ✓ Expected outcomes

Description of Measurement/Metric

Describe the measure(s) that will be used to support the overall approach to Real World Testing.

| Measurement/Metric | Description |
|--------------------|---|
| 170.315(b)(1) | Over a 90-day period: 1) Number of CCDAs created and sent 2) Number of CCDAs received via edge protocols |
| 170.315(c)(1) | Over a 90-day period: 1) Number and list of quality measures configured in instance 2) Number of quality measures with positive numerator values 3) Number of quality measures with positive denominator values Successful generation of a QRDA file for export |
| 170.315(g)(7) | Number of requests for a patient ID or token with sufficient information. |
| 170.315(g)(9) | Number of requests for a patient’s data made by an application via a data category request using a valid patient ID or token for a specific 90-day date range |
| 170.315(g)(10) | Number of requests for a patient’s Summary Record made by an application via an all-data category request using a valid patient ID or token for a specific 90-day date range |
| 170.315(h)(1) | 1) Number of Direct Messages sent and 2) Number of Delivery Notifications received 3) Number of Direct Messages received 4) Number of Delivery Notifications sent |

Associated Certification Criteria

List certification criteria associated with the measure and if updated to the 2015 Edition Cures Update criteria. If conformance to the criteria depends on any Relied Upon Software, this should be noted in your Real World Testing plan for any metrics that would involve use of that software in testing.

| Measurement/Metric | Associated Certification Criteria | Relied Upon Software (if applicable) |
|--------------------|-----------------------------------|--------------------------------------|
| 170.315(b)(1) | Criteria Link | EMR Direct Interoperability Engine |
| 170.315(c)(1) | Criteria Link | N/A |
| 170.315(g)(7) | Criteria Link | N/A |
| 170.315(g)(9) | Criteria Link | N/A |
| 170.315(g)(10) | Criteria Link | N/A |
| 170.315(h)(1) | Criteria Link | EMR Direct Interoperability Engine |

Justification for Selected Measurement/Metric

Provide an explanation for the measurement/metric selected to conduct Real World Testing.

| Measurement/Metric | Justification |
|--------------------|--|
| 170.315(b)(1) | Perk Medical Systems will demonstrate the required certified capabilities by demonstrating how often CCDAs are created and exchanged with other systems to demonstrate the certified functionality is available and effective, regardless of the frequency it is used. |
| 170.315(b)(10) | Perk Medical Systems will evaluate the capability to successfully generate at least 1 full EHI export for a single patient in near real-time without support from the developer with real world end users. Further we intend to quantify the client/practice requests for bulk export as a means of utilization tracking. |
| 170.315(c)(1) | Perk Medical Systems intends to record the measures, frequency, through numerator and denominator values, and QRDA output that CQM files are imported and/or exported by providers to demonstrate the certified capability is available and effective, regardless of the frequency it is used. |
| 170.315(g)(7) | Perk Medical Systems intends to record the frequency that patient ID requests are received by providers via API to demonstrate the certified capability is available and effective, regardless of the frequency it is used. |
| 170.315(g)(9) | Perk Medical Systems intends to record the frequency that patient data requests by category are received by providers and fulfilled via API to demonstrate the certified capability is available and effective, regardless of the frequency it is used. |
| 170.315(g)(10) | Perk Medical Systems intends to record the frequency that patient data requests for all categories are received by providers and fulfilled via API to demonstrate the certified capability is available and effective, regardless of the frequency it is used. |
| 170.315(h)(1) | Since not all systems respond with MDNs, we cannot reliably use that metric to define success. Furthermore, it is not feasible to obtain copies of Direct Messages from “outside” developers or providers. Therefore, we intend to demonstrate the required certified capabilities by demonstrating how often Direct Messages are exchanged with other systems to demonstrate the certified capability is available and effective, regardless of the frequency it is used. |

Care Setting(s)

The expectation is that a developer’s Real World Testing plan will address each type of clinical setting in which their certified health IT is marketed. Health IT developers are not required to test their certified health IT in every setting in which it is marketed for use. Developers should address their choice of care and/or practice settings to test and provide a justification for the chosen approach.

Note: Health IT developers may bundle products by care setting, criteria, etc. and design one plan to address each, or they may submit any combination of multiple plans that collectively address their products and the care settings in which they are marketed

List each care setting which is covered by the measure and an explanation for why it is included.

| Care Setting | Justification |
|---------------------------|---|
| Primary Care - Outpatient | This care setting is used by the majority of the practices that use ezPractice. |

Expected Outcomes

Health IT developers should detail how the approaches chosen will successfully demonstrate that the certified health IT:

- 1) is compliant with the certification criteria, including the required technical standards and vocabulary codes sets.
- 2) is exchanging electronic health information (EHI) in the care and practice settings for which it is marketed for use; and/or,
- 3) EHI is received by and used in the certified health IT.

(from 85 FR 25766)

Not all of the expected outcomes listed above will be applicable to every certified Health IT Module, and health IT developers may add an additional description of how their measurement approach best addresses the ongoing interoperability functionality of their product(s). Health IT developers could also detail outcomes that should not result from their measurement approach if that better describes their efforts.

Within this section, health IT developers should also describe how the specific data collected from their Real World Testing measures demonstrate expected results. Expected outcomes and specific measures do not necessarily have to include performance targets or benchmarks, but health IT developers should provide context for why specific measures were selected and how the metrics demonstrate individual criterion functionality, EHI exchange, and/or use of EHI within certified health IT, as appropriate.

| Measurement/Metric | Expected Outcomes |
|--------------------|--|
| 170.315(b)(1) | The expectation is there will be moderate utilization by end users with a high success rate. |
| 170.315(b)(10) | The expectation is that EHI export for single patient will function successfully for all users. The expectation for bulk quantification is that this new requirement will have limited to no use at the time of testing. |
| 170.315(c)(1) | The expectation is that, at the time of testing, there will be CQMs listed in production, positive values in numerator and denominator fields and that a QRDA can be created and exported. |
| 170.315(g)(7) | The expectation is there will be low utilization by providers. |
| 170.315(g)(9) | The expectation is there will be low or lack of utilization by providers. |
| 170.315(g)(10) | The expectation is there will be a low or lack of utilization by providers. |
| 170.315(h)(1) | The expectation is there will be moderate utilization by providers with a high success rate. |

SCHEDULE OF KEY MILESTONES

Include steps within the Real World Testing plan that establish milestones within the process. Include details on how and when the developer will implement measures and collect data. Key milestones should be relevant and directly related to expected outcomes discussed in the next section.

For each key milestone, describe when Real World Testing will begin in specific care settings and the date/timeframe during which data will be collected.

| Key Milestone | Care Setting | Date/Timeframe |
|---|------------------------|----------------|
| Begin communication with clients to ask for their support and participation in real-world testing. The goal is to have enough clients committed for real world testing by the end of 2Q-2024. | Office/ambulatory care | Q2 2024 |
| Real world testing with clients will be scheduled and performed. It is expected that a preparatory call will be done with clients to prepare them for testing activities. | Office/ambulatory care | Q3 and Q4 2024 |
| During the last quarter of the year, the CY 2024 real-world test plan will be completed according to ONC and ONC-ACB requirements and expectations. Test plan will be prepared for submission before the end of the year. | Office/ambulatory care | Q4 2024 |
| We will document our CY 2024 test results into our RWT Test Report and submit to our ONC-ACB. | Office/ambulatory care | February 2025 |

ATTESTATION

The Real World Testing plan must include the following attestation signed by the health IT developer authorized representative.

Note: The plan must be approved by a health IT developer authorized representative capable of binding the health IT developer for execution of the plan and include the representative's contact information.ⁱⁱ

This Real World Testing plan is complete with all required elements, including measures that address all certification criteria and care settings. All information in this plan is up to date and fully addresses the health IT developer's Real World Testing requirements.

Authorized Representative Name: Ashok Chinthala

Authorized Representative Email: achinthala@pcbapps.com

Authorized Representative Phone: (732) 302-0100 x 345

Authorized Representative Signature:



Representative Signature: Date:12/1/2023

ⁱ Certified health IT continues to be compliant with the certification criteria, including the required technical standards and vocabulary codes sets; certified health IT is exchanging EHI in the care and practice settings for which it is marketed for use; and EHI is received by and used in the certified health IT. (85 FR 25766)

ⁱⁱ <https://www.federalregister.gov/d/2020-07419/p-3582>